

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VLADIMIR MALIAROV, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

EROS INTERNATIONAL PLC, JYOTI  
DESHPANDE, ANDREW HEFFERNAN,  
PREM PARAMESWARAN, KISHORE  
LULLA, VIJAY AHUJA, NARESH  
CHANDRA, DILIP THAKKAR, SUNIL  
LULLA, MICHAEL KIRKWOOD, KEN  
NAZ, DEUTSCHE BANK SECURITIES  
INC., MERRILL LYNCH, PIERCE, FENNER  
& SMITH INCORPORATED, UBS  
SECURITIES LLC, JEFFERIES LLC,  
CREDIT SUISSE SECURITIES (USA) LLC,  
and EM SECURITIES LLC,

Defendants.

Case No. 1:15-cv-08956-AJN

**NOTICE OF MOTION OF JOHN J. SCIORTINO FOR APPOINTMENT OF LEAD  
PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Ira M. Press, dated January 12, 2015, the exhibits attached thereto, the accompanying Memorandum of Law and all prior pleadings and proceedings had herein, Class member John J. Sciortino (the “Movant”) will move this Court, before the Honorable Alison J. Nathan, United States District Judge, in Courtroom 906, Daniel Patrick Moynihan United States Courthouse, 40 Foley Square, New York, New York, on a date and at a time designated by the Court, for: (i) an order for Movant’s appointment, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), as Lead Plaintiffs for the proposed class in the above-captioned action; (ii) the Court’s approval of Movant’s selection of the law firm of Kirby McInerney LLP as Lead Counsel for the proposed Class; and (iii) such other and further relief as the Court may deem just and proper.

Dated: January 12, 2016

Respectfully Submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press

Ira M. Press

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*Attorneys for Proposed Lead Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was forwarded to all counsel of record through the Court's ECF system on January 12, 2016.

/s/ Ira M. Press  
Ira M. Press

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**[PROPOSED] ORDER**

Having considered the motion of John J. Sciortino for appointment as Lead Plaintiff and approval of selection of Lead Counsel, the accompanying Memorandum of Law and Declaration of Ira M. Press in support thereof, and good cause appearing therefore, **IT IS HEREBY ORDERED:**

1. Pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) John J. Sciortino is appointed Lead Plaintiff in the above-captioned securities class action; and
2. The law firm of Kirby McInerney LLP is hereby appointed Lead Counsel for the proposed Class.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE ALISON J NATHAN  
UNITED STATES DISTRICT JUDGE